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Federal Communications Commission  
Office of the Secretary

Before the  
FEDERAL COMMUNICATIONS COMMISSION-GOLD  
Washington, D.C. 20554

In the Matter of )  
 )  
Advanced Television Systems )  
and Their Impact on the )  
Existing Broadcast Service )  
 )  
Review of Technical and )  
Operational Requirements: )  
part 73-E, Television )  
Broadcast Stations )  
 )  
Reevaluation of the UHF )  
Television Channel and )  
Distance Separation )  
Requirements of Part 73 of )  
the Commission's Rules )

MM Docket No. 87-268 /

COMMENTS OF PULITZER BROADCASTING COMPANY

Pulitzer Broadcasting Company ("PBC"), by its attorneys, hereby submits its response to the Notice of Inquiry on Advanced Television Systems ("NOI"), released by the Commission in the above-captioned proceeding on August 20, 1987 (2 FCC Rcd. 5125).

Summary of PBC's Position

PBC is the licensee or the parent of the licensee of the following seven television broadcast stations: KETV, Omaha, Nebraska; KOAT-TV, Albuquerque, New Mexico; WGAL-TV, Lancaster, Pennsylvania; WLKY-TV, Louisville, Kentucky; WPTA-TV, Fort Wayne, Indiana; WXII-TV, Winston-Salem, North Carolina; and WYFF-TV, Greenville, South Carolina.

Over nine months ago, on February 19, 1987, PBC and 56 other broadcast organizations joined with the Association of

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Maximum Service Telecasters, Inc. ("MST") in petitioning the Commission to initiate a proceeding to explore the issues arising from the introduction of advanced television systems ("ATV") and their possible impact on the existing television broadcast service, especially as they relate to the Commission's spectrum allocation and television channel allotment policies. As noted in the NOI, this petition pointed out that the emergence of these new advanced television technologies places traditional local television service at an historic crossroads -- without the opportunity to improve off-air television picture and sound quality in some manner, the television broadcast service could be shut out of the video marketplace to such an extent that it could be relegated to a second-class service, with serious implications for the future of off-air television service to the public. See NOI, at ¶2.

PBC applauds the Commission's decision to initiate a wide-ranging inquiry to consider the technical and public policy issues surrounding the use of advanced television technologies by television broadcast licensees. The Commission's Notice of Inquiry is a thoughtful document which raises important questions about the advantages and disadvantages of the various terrestrial broadcast ATV implementation options. PBC also supports the Commission's decision to create an industry advisory committee to assist the agency in gathering and processing information concerning ATV standards and spectrum requirements.

PBC, a member of MST, hereby endorses the Initial

Comments of MST filed in this proceeding today. Specifically, PBC concurs with MST that the following four propositions should guide the Commission's inquiry into ATV:

1. Local broadcasters must have the opportunity to provide ATV of a quality competitive with non-video media.
2. Compatibility with existing receivers and broadcast channels must be among the most important goals in evaluating ATV systems.
3. Developmental, performance, spectrum and interference issues cannot be separated.
4. Consideration of issues such as standards, flexible allocations, and interference-trading at this early stage of the proceeding would be premature.

#### Limitations of the Current NTSC Standard

As indicated in the NOI, the NTSC standard has remained essentially unchanged for almost half a century. NOI, at ¶5. The Commission is aware that the NTSC standard suffers from a number of deficiencies that limit its video and audio quality, including interlace color and quality defects. Id., at ¶8. It is now evident that new receiver and transmission qualities will significantly improve the technical quality of television and make the NSTC standard obsolete as the benchmark of video quality.

In order for local broadcasters to provide ATV of a quality competitive with other audio, video and non-video

systems, they must be allowed the opportunity to implement ATV systems of competitive quality. Specifically, quality must approach 35 mm film; artifacts must disappear; aspect ratios should approximate 16 to 9; and sound should improve to digital standard levels.

**ATV: The New Standard for Broadcasters**

MST, in its Initial Comments, has demonstrated that from the perspective of the consumer, the producer and the distributor, there is little reason to doubt the eventual transcendence of ATV and the demise of the current NTSC system. PBC submits that ATV should be the standard for all broadcasters. A "protected" mode such as BTSC stereo transmission is desired. The Commission should take a leadership role in developing such a standard -- the failure of the Commission to adopt a standard for AM stereo and its adverse impact on the development of a nationwide system of AM stereo underscore the need for positive action by the Commission.

Moreover, part and parcel of an acceptable transmission standard is the requirement to be "backward compatible" -- the standard must be capable of being decoded by existing television sets. At stake is the over 80 billion dollars which have been invested in existing television sets. The American public has trusted the broadcast industry and made large investments in its future. Color transmission is compatible with monochrome and

stereo transmission is compatible with mono -- accordingly, ATV should be compatible with NTSC.

### Preparing for the Future

ATV is a development which will profoundly influence the future of local television. As the Commission is aware, several major research facilities are committing millions of dollars to bringing ATV to reality. This research is being conducted in a competitive environment, with much of the research premised on the availability of spectrum to television broadcasting. Thus, it would be a critical blow to this extensive research effort if the Commission were to reallocate existing spectrum from television to other services. It is therefore essential that the Commission maintain flexibility in the event that it determines to allocate additional band width to ATV.

Time is necessary to bring such research to fruition. When an acceptable transmission standard is available, reassessment of one or all of the "taboos" in UHF or separation requirements can be undertaken at that time. However, until such research is complete, relaxation of taboos and distance requirements would be premature. PBC agrees with MST that questions such as the additional band width required, if any, and the appropriate spectrum location of augmentation channels cannot be answered with any assurance until the proposed ATV systems

have been identified, their relative quality established, their feasibility and off-air ruggedness demonstrated and their interference characteristics determined. Accordingly, the Commission should not resolve any spectrum allocation issues until the ATV inquiry has progressed sufficiently to enable it to determine with certainty that such action will not foreclose television broadcasters and the American public from enjoying the full benefits of ATV.

Respectfully Submitted

PULITZER BROADCASTING COMPANY

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